

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

DR. THOMAS J. WYLY,

Plaintiff,

v.

THE INTERNATIONAL
FOUNDATION FOR EDUCATION
AND SELF-HELP and THE LEON H.
SULLIVAN FOUNDATION,

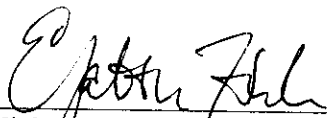
Defendants.

Case No. 04-11151-EFH

**DEFENDANT THE LEON H. SULLIVAN FOUNDATION'S
LOCAL RULE 16.1(D)(3) CERTIFICATION**

Pursuant to Local Rule 16.1(D)(3), defendant The Leon H. Sullivan Foundation and its attorneys hereby certify that they have conferred with a view to establishing a budget for the costs of conducting the full course—and various alternative courses—for the above-captioned litigation and have conferred to consider the resolution of the litigation through the use of alternative dispute resolution programs such as those outlined in Local Rule 16.4.

By its attorneys:

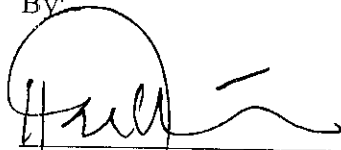


Michael Rosen, BBO# 559954
Elizabeth Heinrich, BBO #648090
FOLEY HOAG LLP
155 Seaport Boulevard
Boston, MA 02210

Dated: 10/4, 2004

THE LEON H. SULLIVAN FOUNDATION,

By:

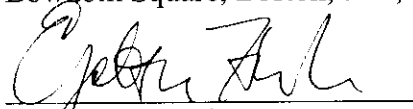


THE LEON H. SULLIVAN FOUNDATION
1800 K Street, NW, Suite 1021
Washington, DC 20006

Dated: Sept. 22, 2004

CERTIFICATE OF SERVICE

I hereby certify that on October 6, 2004, I served a copy of the foregoing by mail to counsel for Plaintiff, David A. Browne, Sherin and Lodgen, LLP, 100 Summer Street, Boston, MA 02110 and counsel for the International Foundation for Education and Self Help, Marie F. Mercier, Kotin Crabree & Strong, LLP, One Bowdoin Square, Boston, MA, 02114.


Elizabeth Heinrich